

Exhibit C

John S Spadaro

From: "Robert J. Leoni" <rleoni@mslde.com>
To: "John S Spadaro" <jspadaro@msllaw.com>; <Jsheehanspadaro1@aol.com>;
<ccheyney@swartzcampbell.com>
Cc: <hjones@msllaw.com>
Sent: Thursday, April 21, 2005 5:06 PM
Subject: RE: Eames v. Nationwide; outstanding subpoenas

John

I dont know whether you would want the depositions or not. I am going to try to get faxed to you by tommorow, documents which I beleive are responsive.

These are the form documents such as the application, the Form A, and a Memorandum of Insurance. We are going to object to production of any client file documents. These files contain the forms with the information filled in, and are confidential and privileged. If they were produced we would redact the client specific information so that you would be getting a form which you are going to get anyway.

If there are other documents which are confidential and proprietary, then we would require an agreement to confidentiality prior to producing them. I am still working on the document production process.

I do not believe that you will need to depose all three agents on Monday as they probably have the same information. Please let me know.

You noticed each deponent for 10:00 a.m. Do you want them to appear on a staggered basis or all at once?

Rob

-----Original Message-----

From: John S Spadaro [mailto:jspadaro@msllaw.com]
Sent: Thursday, April 21, 2005 11:16 AM
To: Robert J. Leoni; Jsheehanspadaro1@aol.com; ccheyney@swartzcampbell.com
Cc: hjones@msllaw.com
Subject: Re: Eames v. Nationwide; outstanding subpoenas

Rob:

In the interest of moving forward, I'll pass over your criticism of my earlier letter to the deponents.

Whether we would accept production of documents in lieu of testimony would depend on the quality of the production; but with that said, I could certainly envision a scenario in which we get the documents we need and forgo the depositions altogether. In other words, the answer to your question is a qualified yes: if we get what we're entitled to, and we get it quickly, we can dispense with oral depositions under these subpoenas.

Can we discuss these issues today or tomorrow in a substantive way? Is there a convenient time for me to call? John